



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

January 16, 2009

Mr. Gerardo Rios (R9AirPermits_sc@epa.gov)
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Re: LADWP Valley Generation Station, facility ID 800193

Dear Mr. Rios:

The South Coast Air Quality Management District (AQMD) has received and reviewed an application from Los Angeles Department of Water and Power (LADWP) for a minor permit revision to the Title V permit of its Valley Generation Station (VGS). The proposed permit revision includes replacement of 6 gasoline dispensing nozzles with Healy Phase II EVR nozzles not including ISD and will modify the conditions of the gasoline dispensers and gasoline storage tanks to ensure compliance with District Rule 461. The following is a detailed description.

Application #	Device #	Section #	Proposed Actions
490638	D94,95,96,97,98, 99,100,102,109	D	Install new nozzles and modify operation condition to ensure compliance with Rule 461. The new conditions are provided in Appendix B
490661			Title V facility permit revision

In accordance with Rule 3006, a copy of our engineering analysis and the proposed minor revision to the existing Title V permit and are enclosed for the 45-day EPA review. If you have any questions or wish to provide comments regarding this project, please call Mr. Li Chen (909) 396-2426 or Mr. John Yee (909) 396-2531.

Very truly yours,

Mike Mills

Mike Mills
Senior Manager
General Commercial and Energy Permitting
Engineering and Compliance

Attachments

cc: Bruce Moore, LADWP

Clearing the air

FACILITY PERMIT TO OPERATE

**LA CITY, DWP VALLEY GENERATING STATION
11801 SHELDON ST
SUN VALLEY, CA 91352**

NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Barry R. Wallerstein, D. Env.
EXECUTIVE OFFICER

By _____
Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 2 : PETROLEUM STORAGE					
System 2 : Aboveground Tank					
STORAGE TANK, EXTERNAL FLOATING ROOF, NO. 171002, FUEL OIL, 171000 BBL; DIAMETER: 160 FT; HEIGHT: 48 FT WITH A/N: NR FLOATING ROOF, WELDED SHELL PRIMARY SEAL, METALLIC SHOE SECONDARY SEAL, WIPER TYPE	D22				B22.1, H23.1 K171.1
STORAGE TANK, EXTERNAL FLOATING ROOF, NO. 171003, FUEL OIL, 171000 BBL; DIAMETER: 160 FT; HEIGHT: 48 FT WITH A/N: C25878 FLOATING ROOF, WELDED SHELL PRIMARY SEAL, METALLIC SHOE	D23				B22.1, H23.1
STORAGE TANK, EXTERNAL FLOATING ROOF, NO. 171004, FUEL OIL, 171000 BBL; DIAMETER: 160 FT; HEIGHT: 48 FT WITH A/N: C25879 FLOATING ROOF, WELDED SHELL	D24				B22.1, H23.1

* (1)(1A)(1B) Denotes RECLAIM emission factor
(3) Denotes RECLAIM concentration limit
(5)(5A)(5B) Denotes command and control emission limit
(7) Denotes NSR applicability limit
(9) See App B for Emission Limits
(2)(2A)(2B) Denotes RECLAIM emission rate
(4) Denotes BACT emission limit
(6) Denotes air toxic control rule limit
(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)
(10) See Section J for NESHAP/MACT requirements

** Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

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Process 2 : PETROLEUM STORAGE					
PRIMARY SEAL, METALLIC SHOE SECONDARY SEAL, WIPER TYPE					
STORAGE TANK, EXTERNAL FLOATING ROOF, NO. 171005, FUEL OIL, 171000 BBL; DIAMETER: 160 FT; HEIGHT: 48 FT WITH A/N: C25880 FLOATING ROOF, WELDED SHELL PRIMARY SEAL, METALLIC SHOE	D25				B22.1, H23.1
STORAGE TANK, EXTERNAL FLOATING ROOF, NO. 171006, FUEL OIL, 171000 BBL; DIAMETER: 160 FT; HEIGHT: 48 FT WITH A/N: C25881 FLOATING ROOF, WELDED SHELL PRIMARY SEAL, METALLIC SHOE SECONDARY SEAL, WIPER TYPE	D26				B22.1, H23.1
STORAGE TANK, EXTERNAL FLOATING ROOF, NO. 12501, FUEL OIL, 12858 BBL; DIAMETER: 48 FT; HEIGHT: 40 FT WITH A/N: C25874	D27				B22.1, H23.1

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Process 2 : PETROLEUM STORAGE					
FLOATING ROOF, WELDED SHELL PRIMARY SEAL, METALLIC SHOE					
STORAGE TANK, EXTERNAL FLOATING ROOF, NO. 12502, FUEL OIL, 12858 BBL; DIAMETER: 48 FT; HEIGHT: 40 FT WITH A/N: C25875 FLOATING ROOF, WELDED SHELL PRIMARY SEAL, METALLIC SHOE	D28				B22.1, H23.1
STORAGE TANK, PONTOON, FIXED ROOF, INTERNAL FLOATING ROOF, DIESEL FUEL, 60300 BBL; DIAMETER: 99 FT; HEIGHT: 48 FT WITH A/N: 415749 FLOATING ROOF, PONTOON, WELDED SHELL PRIMARY SEAL, METALLIC SHOE	D161				B22.1, B59.1, C1.6, H23.1, K67.7

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 4 : FUEL OIL UNLOADING RACK					
SKIMMING POND, CONCRETE BASIN. WITH WEIR, WIDTH: 26 FT 4 IN; HEIGHT: 6 FT 6 IN; LENGTH: 40 FT A/N: 189815	D47				H23.8
SUMP, FUEL OIL, UNDERGROUND, 900 BARRELS, WIDTH: 13 FT 8 IN; DEPTH: 15 FT; LENGTH: 23 FT A/N: 189815	D46				H23.8
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D40				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D41				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D42				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D43				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D44				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D45				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D72				

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Process 4 : FUEL OIL UNLOADING RACK					
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D73				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D74				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D75				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D76				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D77				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D78				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D79				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D80				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D81				

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 4 : FUEL OIL UNLOADING RACK					
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D82				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D83				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D84				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D85				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D86				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D87				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D88				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D89				
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D90				

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Process 4 : FUEL OIL UNLOADING RACK					
UNLOADING ARM, TANK TRUCK, TOP, FUEL OIL A/N: 189815	D91				
UNLOADING ARM, TANK TRUCK, DIESEL FUEL, DIAMETER: 6 IN A/N: 415750	D164				
LOADING ARM, BOTTOM, TANK TRUCK, DIESEL FUEL, WITH 2" DIA VAPOR RECOVERY HOSE A/N: 415750	D165				E178.1
Process 5 : ABRASIVE BLASTING					
ABRASIVE BLASTING, OPEN, DIAMETER: 0.375 IN; 100 PSIG A/N: 120357	D49			PM: (9) [RULE 1140,2-1-1980;RULE 1140,8-2-1985;RULE 405,2-7-1986]	D323.1
Process 6 : SPRAY BOOTH					
SPRAY COATING OPERATION, WITH FABRIC FILTER, SPRAY BOOTH A/N: 271535	D50			PM: (9) [RULE 404,2-7-1986] ; ROG: (9) [RULE 1107,11-9-2001;RULE 1107,1-6-2006;RULE 1171,11-7-2003;RULE 1171,2-4-2008]	A63.1, B27.1, C6.1, D12.1, D322.1, E175.1, H23.7, K67.1, K67.2
Process 7 : FUEL STORAGE & DISPENSING					
STORAGE TANK, UNDERGROUND, GASOLINE, PHASE I VAPOR RECOVERY SYSTEM PHIL-TITE (VR-101-E/K), 12000 GALS A/N: 490638	D94			VOC: (9) [RULE 461, Bellowsless Conditions,3-7-2008;RULE 461, Healy, Phase I and II EVR Conditions,3-7-2008;RULE 461, Universal Conditions,3-7-2008]	C1.8

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Process 7 : FUEL STORAGE & DISPENSING					
STORAGE TANK, METHANOL COMPATIBLE, UNDERGROUND, GASOLINE, DUAL COMPARTMENT, PHASE I VAPOR RECOVERY SYSTEM PHIL-TITE (VR-101-E/K), 12000 GALS A/N: 490638	D95			VOC: (9) [RULE 461, Bellowsless Conditions, 3-7-2008; RULE 461, Healy, Phase I and II EVR Conditions, 3-7-2008; RULE 461, Universal Conditions, 3-7-2008]	C1.8
FUEL DISPENSING NOZZLE, HEALY PHASE II EVR W/O ISD: VR-201, GASOLINE, VENTED TO A VAPOR RECOVERY SYSTEM A/N: 490638	D96			VOC: (9) [RULE 461, Bellowsless Conditions, 3-7-2008; RULE 461, Healy, Phase I and II EVR Conditions, 3-7-2008; RULE 461, Universal Conditions, 3-7-2008]	C1.8
FUEL DISPENSING NOZZLE, HEALY PHASE II EVR W/O ISD: VR-201, GASOLINE, VENTED TO A VAPOR RECOVERY SYSTEM A/N: 490638	D97			VOC: (9) [RULE 461, Bellowsless Conditions, 3-7-2008; RULE 461, Healy, Phase I and II EVR Conditions, 3-7-2008; RULE 461, Universal Conditions, 3-7-2008]	C1.8
FUEL DISPENSING NOZZLE, HEALY PHASE II EVR W/O ISD: VR-201, GASOLINE, VENTED TO A VAPOR RECOVERY SYSTEM A/N: 490638	D98			VOC: (9) [RULE 461, Bellowsless Conditions, 3-7-2008; RULE 461, Healy, Phase I and II EVR Conditions, 3-7-2008; RULE 461, Universal Conditions, 3-7-2008]	C1.8
FUEL DISPENSING NOZZLE, HEALY PHASE II EVR W/O ISD: VR-201, GASOLINE, VENTED TO A VAPOR RECOVERY SYSTEM A/N: 490638	D99			VOC: (9) [RULE 461, Bellowsless Conditions, 3-7-2008; RULE 461, Healy, Phase I and II EVR Conditions, 3-7-2008; RULE 461, Universal Conditions, 3-7-2008]	C1.8

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Process 7 : FUEL STORAGE & DISPENSING					
FUEL DISPENSING NOZZLE, HEALY PHASE II EVR W/O ISD: VR-201, GASOLINE, VENTED TO A VAPOR RECOVERY SYSTEM A/N: 490638	D100			VOC: (9) [RULE 461, Bellowsless Conditions,3-7-2008;RULE 461, Healy, Phase I and II EVR Conditions,3-7-2008;RULE 461, Universal Conditions,3-7-2008]	C1.8
FUEL DISPENSING NOZZLE, HEALY PHASE II EVR W/O ISD: VR-201, GASOLINE, VENTED TO VAPOR RECOVERY SYSTEM A/N: 490638	D102			VOC: (9) [RULE 461, Bellowsless Conditions,3-7-2008;RULE 461, Healy, Phase I and II EVR Conditions,3-7-2008;RULE 461, Universal Conditions,3-7-2008]	C1.8
STORAGE TANK, UNDERGROUND, SPILL CONTAINMENT, NOT METHANOL COMPATIBLE, 4000 GALS A/N: 490638	D109				
Process 8 : OIL/WATER SEPARATION					P1.1
OIL WATER SEPARATOR, FIXED ROOF, HEIGHT: 17 FT 10 IN; DIAMETER: 15 FT 2 IN A/N: 387103	D110				H23.8
SETTLING TANK, COVERED, WITH A HEATING COIL, HEIGHT: 17 FT 10 IN; DIAMETER: 15 FT 2 IN A/N: 387103	D111				H23.8
TANK, RETENTION, HEIGHT: 6 FT 2 IN; DIAMETER: 3 FT 2 IN A/N: 387103	D112				H23.8

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 8 : OIL/WATER SEPARATION					P1.1
FLOATATION UNIT, PARTIALLY UNDER GRADE, WITH A HEATING COIL A/N: 387103	D113				H23.8
SKIMMING POND, WITH 5 FEET UNDER GRADE, WIDTH: 7 FT 6 IN; HEIGHT: 7 FT; LENGTH: 15 FT 5 IN A/N: 387103	D114				H23.8
TANK, HEATED, DECANTING, WIDTH: 10 FT 10 IN; HEIGHT: 3 FT 7 IN; LENGTH: 14 FT A/N: 387103	D115				H23.8
SUMP, WASTE WATER, L-SHAPED, WIDTH: 4 FT 5 IN; HEIGHT: 1 FT 8 IN; LENGTH: 32 FT 7 IN A/N: 387103	D116				H23.8
OIL WATER SEPARATOR, FIXED ROOF, HIGHLAND TANK, MODEL HT-4000, 24000 GALS/HR; DIAMETER: 5 FT 4 IN; LENGTH: 24 FT A/N: 387103	D167				B89.1, H23.9
Process 9 : SOLVENT RECOVERY					
TANK, HEATED, SOLVENT, EQUIPPED WITH MICROPROCESSOR-CONTROLLED- THERMOSTAT, 10 GALS; WIDTH: 1 FT 8 IN; HEIGHT: 2 FT 4 IN; LENGTH: 2 FT 11 IN A/N: 294557	D122				C1.3

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Process 10 : R-219 EXEMPT EQUIPMENT SUBJECT TO SOURCE-SPECIFIC RULES					
RULE 219 EXEMPT EQUIPMENT, CLEANING EQUIPMENT, SMALL, UNHEATED, NON-CONVEYORIZED	E123			ROG: (9) [RULE 1171,11-7-2003;RULE 1171,2-1-2008]	H23.6
RULE 219 EXEMPT EQUIPMENT, REFRIGERATION UNITS	E124				H23.4
RULE 219 EXEMPT EQUIPMENT, ABRASIVE BLASTING EQUIPMENT, GLOVE-BOX, < = 53 FT3, WITH DUST FILTER	E125			PM: (9) [RULE 1140,2-1-1980;RULE 1140,8-2-1985;RULE 404,2-7-1986;RULE 405,2-7-1986]	D322.2, D381.1, K67.1
RULE 219 EXEMPT EQUIPMENT, REFRIGERANT RECOVERY AND/OR RECYCLING UNITS,	E127				H23.3
RULE 219 EXEMPT EQUIPMENT, COATING EQUIPMENT, PORTABLE, ARCHITECTURAL COATINGS	E128			ROG: (9) [RULE 1113,11-8-1996;RULE 1113,7-13-2007;RULE 1171,11-7-2003;RULE 1171,2-1-2008]	K67.3
RULE 219 EXEMPT EQUIPMENT, COOLING TOWERS	E129				H23.5

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LA CITY, DWP VALLEY GENERATING STATION**

SECTION D: DEVICE ID INDEX

**The following sub-section provides an index
to the devices that make up the facility
description sorted by device ID.**

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: DEVICE ID INDEX

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FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: DEVICE ID INDEX

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FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

FACILITY CONDITIONS

F9.1 Except for open abrasive blasting operations, the operator shall not discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:

(a) As dark or darker in shade as that designated No.1 on the Ringelmann Chart, as published by the United States Bureau of Mines; or

(b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (a) of this condition.

[RULE 401, 3-2-1984; RULE 401, 9-11-1998]

F14.1 The operator shall not use fuel oil containing sulfur compounds in excess of 0.05 percent by weight.

[RULE 431.2, 5-4-1990]

F14.2 The operator shall not purchase fuel oil containing sulfur compounds in excess of 15 ppm by weight as supplied by the supplier.

This condition shall become effective on or after June 1, 2004.

[RULE 431.2, 9-15-2000]

F16.1 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

purchase records of fuel oil and sulfur content of the fuel

[RULE 3004(a)(4)-Periodic Monitoring, 8-11-1995]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

F18.1 Acid Rain SO2 Allowance Allocation for affected units are as follows:

Device ID	Boiler ID	Contaminant	Tons in any year
1	Boiler No. 1	SO2	121
5	Boiler No. 2	SO2	140
9	Boiler No. 3.	SO2	388
13	Boiler No. 4	SO2	349

a). The allowance allocation(s) shall apply to calendar years 2000 through 2009.

b). The number of allowances allocated to Phase II affected units by U.S. EPA may change in a 1998 revision to 40CFR73 Tables 2,3, and 4. In addition, the number of allowances actually held by an affected source in a unit account may differ from the number allocated by U.S. EPA. Neither of the aforementioned conditions necessitate a revision to the unit SO2 allowance allocations identified in this permit (see 40 CFR 72.84)

[40CFR 73 Subpart B, 1-11-1993]

F24.1 Accidental release prevention requirements of Section 112(r)(7):

a). The operator shall comply with the accidental release prevention requirements pursuant to 40 CFR Part 68 and shall submit to the Executive Officer, as a part of an annual compliance certification, a statement that certifies compliance with all of the requirements of 40 CFR Part 68, including the registration and submission of a risk management plan (RMP).

b). The operator shall submit any additional relevant information requested by the Executive Officer or designated agency.

[40CFR 68 - Accidental Release Prevention, 5-24-1996]

PROCESS CONDITIONS

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

P1.1 The operator shall limit the throughput to no more than 210600 gallon(s) per day.

For the purpose of this condition, throughput shall be defined as the treatment of waste-oil mixtures.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Processes subject to this condition : 8]

DEVICE CONDITIONS

A. Emission Limits

A63.1 The operator shall limit emissions from this equipment as follows:

CONTAMINANT	EMISSIONS LIMIT
VOC	Less than or equal to 6 LBS IN ANY ONE DAY
VOC	Less than or equal to 116 LBS IN ANY ONE MONTH

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D50]

B. Material/Fuel Type Limits

B22.1 The operator shall not use this equipment with materials having a(n) true vapor pressure of 0.1 psia or greater under actual operating conditions.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D22, D23, D24, D25, D26, D27, D28, D161].

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

- B27.1 The operator shall not use materials containing any compounds identified in the SCAQMD Rule 1401, as amended 07-dec-1990.

[RULE 1401, 12-7-1990]

[Devices subject to this condition : D50]

- B59.1 The operator shall only use the following material(s) in this device :

diesel which meets the specifications of Rule 431.2

[RULE 431.2, 5-4-1990; RULE 431.2, 9-15-2000]

[Devices subject to this condition : D136, D161]

- B89.1 The operator shall not use oily water with VOC content greater than 0.005 grams per liter, including water and exempt compounds.

[RULE 1176, 5-13-1994; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D167]

C. Throughput or Operating Parameter Limits

- C1.1 The operator shall limit the operating time to no more than 8 hour(s) in any one day.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D92]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

C1.2 The operator shall limit the operating time to no more than 125 hour(s) in any one year.

The 125 hours per year shall include no more than 30 hours in any one year for maintenance and testing purposes.

The operation of the engine beyond the 30 hr/yr allotted for engine maintenance and testing shall be allowed only in the event of a loss of grid power or up to 30 minutes prior to a rotating outage, provided that the grid operator or electric utility has ordered rotating outages in the control area where the engine is located or has indicated that it expects to issue such an order at a certain time, and the engine is located in a utility service block that is subject to the rotating outage.

Engine operation shall be terminated immediately after the utility distribution company advises that a rotating outage is no longer imminent or in effect.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D92]

C1.3 The operator shall limit the material processed to no more than 4 gallon(s) per day.

For the purpose of this condition, "materials" shall be defined as organic chemicals.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D122]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

C1.4 The operator shall limit the operating time to no more than 199 hour(s) in any one year.

The 199 hours per year shall include no more than 30 hours in any one year for maintenance and testing purposes.

The operation of the engine beyond the 30 hr/yr allotted for engine maintenance and testing shall be allowed only in the event of a loss of grid power or up to 30 minutes prior to a rotating outage, provided that the grid operator or electric utility has ordered rotating outages in the control area where the engine is located or has indicated that it expects to issue such an order at a certain time, and the engine is located in a utility service block that is subject to the rotating outage.

Engine operation shall be terminated immediately after the utility distribution company advises that a rotating outage is no longer imminent or in effect.

[RULE 1110.2, 2-1-2008; **RULE 1304(a)-Modeling and Offset Exemption, 6-14-1996**; RULE 1470, 6-1-2007]

[Devices subject to this condition : D136]

C1.6 The operator shall limit the throughput to no more than 37000 gallon(s) in any one calendar month.

This condition shall only apply during normal operation. The throughput limit shall be 587,000 gallons for the months during which turbines 6 and 7 are being commissioned. This condition shall not apply during a month in which a natural gas force majeure occurs.

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition. Records shall include monthly invoices for all tank truck fuel unloading activities and the monthly fuel oil meter readings from turbines 5, 6 and 7.

[**RULE 1303(b)(2)-Offset, 5-10-1996**; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D161]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

C1.8 The operator shall limit the gasoline dispensed to no more than 40000 gallon(s) per month.

This limit shall be based on the total combined limit for equipment D94, D95, D96, D97, D98, D99, D100, and D102.

The operator shall maintain written records of the fuel dispensed on a monthly basis. The records shall be kept for a minimum of 5 years and be made available to AQMD personnel upon request.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D94, D95, D96, D97, D98, D99, D100, D102]

C6.1 The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, does not exceed 0.25 inches water column.

To comply with this condition, the operator shall monitor the differential pressure as specified in condition number 12-1.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D50]

C177.1 The operator shall set and maintain the fuel injection timing of the engine at 4 degrees retarded relative to standard timing.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D92]

D. Monitoring/Testing Requirements

D12.1 The operator shall install and maintain a(n) gauge to accurately indicate the differential pressure across the filter.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D50]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

- D12.2 The operator shall install and maintain a(n) non-resettable elapsed time meter to accurately indicate the elapsed operating time of the engine.

[RULE 1110.2, 2-1-2008; **RULE 1303(a)(1)-BACT, 5-10-1996**; RULE 1303(a)(1)-BACT, 12-6-2002; **RULE 1304(a)-Modeling and Offset Exemption, 6-14-1996**; **RULE 2012, 5-6-2005**]

[Devices subject to this condition : D92, D136]

- D322.1 The operator shall perform a quarterly inspection of the equipment and filter media for leaks, broken or torn filter media, and improperly installed filter media.

[**RULE 3004(a)(4)-Periodic Monitoring, 8-11-1995**]

[Devices subject to this condition : D50]

- D322.2 The operator shall perform annual inspection of the equipment and filter media for leaks, broken or torn filter media, and improperly installed filter media.

[**RULE 3004(a)(4)-Periodic Monitoring, 8-11-1995**]

[Devices subject to this condition : E125]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

D323.1 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on a semi-annual basis, at least, unless the equipment did not operate during the entire semi-annual period. The routine semi-annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- 1). Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- 2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD. SUGGESTED CHAR

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions;
- 3). Date and time visible emission was abated; and
- 4). All visible emission observation records by operator or a certified smoke reader.

[RULE 3004(a)(4)-Periodic Monitoring, 8-11-1995]

[Devices subject to this condition : D49]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

D381.1 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours. If any visible emissions (not including condensed water vapor) are detected, the operator shall take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions; and
- 3). Date and time visible emission was abated.

[RULE 3004(a)(4)-Periodic Monitoring, 8-11-1995]

[Devices subject to this condition : E125]

E. Equipment Operation/Construction Requirements

E116.1 This engine shall not be used as part of a demand response program using interruptible service contract in which a facility receives a payment or reduced rates in return for reducing its electric load on the grid when requested to do so by the utility or the grid operator.

[RULE 1470, 6-1-2007]

[Devices subject to this condition : D92, D136]

E162.1 The operator shall use this equipment only during utility failure periods, except for maintenance purposes.

[RULE 1110.2, 6-3-2005; RULE 1304(a)-Modeling and Offset Exemption, 6-14-1996]

[Devices subject to this condition : D136]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

E175.1 The operator shall not use this equipment unless all exhaust air passes through the following:

filter media at least 2 inches thick

[**RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]**

[Devices subject to this condition : D50]

E178.1 The operator shall load diesel into tank trucks using bottom loading.

[**RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; RULE 462, 5-14-1999]**

[Devices subject to this condition : D165]

E193.2 The operator shall operate and maintain this equipment according to the following specifications:

The fuel injection timing of this engine shall be set and maintained at 4 degrees retarded relative to standard production timing at the factory as established by Caterpillar Product News Bulletin "3412 DITTA 500 kw California Configuration" dated July 1993

The equipment may operate for maintenance and testing purpose for up to 30 hours per year.

[**RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1470, 3-4-2005]**

[Devices subject to this condition : D136]

H. Applicable Rules

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

H23.1 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	463

[RULE 463, 3-11-1994]

[Devices subject to this condition : D22, D23, D24, D25, D26, D27, D28, D161]

H23.3 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
Refrigerants	40CFR82, SUBPART	B
Refrigerants	District Rule	1411

[RULE 1411, 3-1-1991; 40CFR 82 Subpart B, 7-14-1992]

[Devices subject to this condition : E127]

H23.4 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
Refrigerants	District Rule	1415

[RULE 1415, 10-14-1994]

[Devices subject to this condition : E124]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

H23.5 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
Chromium, Hexavalent	District Rule	1404

[RULE 1404, 4-6-1990]

[Devices subject to this condition : E129]

H23.6 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1122

[RULE 1122, 7-11-1997]

[Devices subject to this condition : E123]

H23.7 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
PM	District Rule	481
VOC	District Rule	109

[RULE 109, 3-6-1992; RULE 481, 5-5-1978]

[Devices subject to this condition : D50]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

H23.8 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	464

[RULE 464, 12-7-1990]

[Devices subject to this condition : D46, D47, D110, D111, D112, D113, D114, D115, D116]

H23.9 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1176

[RULE 1176, 9-13-1996]

[Devices subject to this condition : D167]

K. Record Keeping/Reporting

K67.1 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

the name of the person performing the inspection and/or maintenance of the filter media

the date, time and results of the inspection

the date, time and description of any maintenance or repairs resulting from the inspection

[RULE 3004(a)(4)-Periodic Monitoring, 8-11-1995]

[Devices subject to this condition : D50, E125]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

- K67.2 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

weekly record of pressure drop across the filter media

[RULE 3004(a)(4)-Periodic Monitoring, 8-11-1995]

[Devices subject to this condition : D50]

- K67.3 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

For architectural applications where no thinners, reducers, or other VOC containing materials are added, maintain semi-annual records for all coating consisting of (a) coating type, (b) VOC content as supplied in grams per liter (g/l) of materials for low-solids coatings, (c) VOC content as supplied in g/l of coating, less water and exempt solvent, for other coatings.

For architectural applications where thinners, reducers, or other VOC containing materials are added, maintain daily records for each coating consisting of (a) coating type, (b) VOC content as applied in grams per liter (g/l) of materials used for low-solids coatings, (c) VOC content as applied in g/l of coating, less water and exempt solvent, for other coatings.

[RULE 3004(a)(4)-Periodic Monitoring, 8-11-1995]

[Devices subject to this condition : E128]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

K67.4 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

date of operation, the elapsed time, in hours, and the reason for operation. Records shall be kept and maintained on file for a minimum of two years and made available to district personnel upon request

An engine operating log listing on a monthly basis the emergency use hours of operation, maintenance and testing hours of operation, and any other hours of use with a description of the reason for operation. Additionally, each time the engine is started manually, the log shall include the date of operation and the timer reading in hours at the beginning and end of operation.

The log shall be kept for a minimum of three calendar years prior to the current year and be made available to District personnel upon request. The total hours of operation for the previous calendar year shall be recorded sometime during the first 15 days of January of each year.

[RULE 1110.2, 2-1-2008; **RULE 1304(a)-Modeling and Offset Exemption, 6-14-1996**; RULE 1470, 6-1-2007]

[Devices subject to this condition : D136]

K67.7 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

monthly throughput, sulfur content and reason for fuel usage

[**RULE 1303(b)(2)-Offset, 5-10-1996**; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D161]

K67.8 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

An engine operating log listing on a monthly basis the emergency use hours of operation, maintenance and testing hours of operation, and any other hours of use with a description of the reason for operation. Additionally, each time the engine is started manually, the log shall include the date of operation and the timer reading in hours at the beginning and end of operation

The log shall be kept for a minimum of three calendar years prior to the current year and be made available to District personnel upon request. The total hours of operation for the previous calendar year shall be recorded sometime during the first 15 days of January of each year

[Devices subject to this condition : D92]

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

K171.1 The operator shall EXACT CHAR CONDITION PARAMETER NOT SET UP

[Devices subject to this condition : D22]

FACILITY PERMIT TO OPERATE

LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS [RULE 1107 1-6-2006]

Except as otherwise provided in Rule 1107

(1) VOC Content of Coatings

A person shall not apply to metal parts and products subject to the provisions of this rule any coatings, including any VOC-containing materials added to the original coating supplied by the manufacturer, which contain VOC in excess of the limits specified below:

VOC LIMITS Less Water and Less Exempt Compounds Effective Dates								
Coating	Air-Dried				Baked			
	gm/l		lb/gal		gm/l		lb/gal	
	Current	7/1/07	Current	7/1/07	Current	7/1/07	Current	7/1/07
General One-Component	275	275	2.3	2.3	275	275	2.3	2.3
General Multi-Component	340	340	2.8	2.8	275	275	2.3	2.3
Military Specification	340	340	2.8	2.8	275	275	2.3	2.3
Etching Filler	420	420	3.5	3.5	420	420	3.5	3.5
Solar-Absorbent	420	420	3.5	3.5	360	360	3.0	3.0
Heat-Resistant	420	420	3.5	3.5	360	360	3.0	3.0
Extreme High-Gloss	420	340	3.5	2.8	360	360	3.0	3.0
Metallic	420	420	3.5	3.5	420	420	3.5	3.5

FACILITY PERMIT TO OPERATE

LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS [RULE 1107 1-6-2006]

VOC LIMITS								
Less Water and Less Exempt Compounds								
Effective Dates, cont.								
Coating	Air-Dried				Baked			
	gm/l		lb/gal		gm/l		lb/gal	
	Current	7/1/07	Current	7/1/07	Current	7/1/07	Current	7/1/07
Extreme Performance	420	420	3.5	3.5	360	360	3.0	3.0
Prefabricated Architectural One-Component	420	275	3.5	2.3	275	275	2.3	2.3
Prefabricated Architectural Multi-Component	420	340	3.5	2.8	275	275	2.3	2.3
Touch Up	420	420	3.5	3.5	360	360	3.0	3.0
Repair	420	420	3.5	3.5	360	360	3.0	3.0
Silicone Release	420	420	3.5	3.5	420	420	3.5	3.5
High-Performance Architectural	420	420	3.5	3.5	420	420	3.5	3.5
Camouflage	420	420	3.5	3.5	420	420	3.5	3.5
Vacuum-Metalizing	420	420	3.5	3.5	420	420	3.5	3.5
Mold-Seal	420	420	3.5	3.5	420	420	3.5	3.5
High-Temperature	420	420	3.5	3.5	420	420	3.5	3.5
Electric-Insulating Varnish	420	420	3.5	3.5	420	420	3.5	3.5
Pan Backing	420	420	3.5	3.5	420	420	3.5	3.5
Pretreatment Coatings	420	420	3.5	3.5	420	420	3.5	3.5

- (2) A person shall not use VOC-containing materials which have a VOC content of more than 200 grams per liter of material for stripping any coating governed by this rule.

FACILITY PERMIT TO OPERATE

LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS [RULE 1107 11-9-2001]

Except as otherwise provided in Rule 1107

(1) VOC Content of Coatings

A person shall not apply to metal parts and products subject to the provisions of this rule any coatings, including any VOC-containing materials added to the original coating supplied by the manufacturer, which contain VOC in excess of the limits specified below:

<u>Coating</u>	LIMITS			
	Grams of VOC Per Liter of Coating, Less Water and Less Exempt Compounds			
	<u>Air Dried</u>	<u>(lb/gal)</u>	<u>Baked</u>	<u>(lb/gal)</u>
General				
One-Component	275	(2.3)	275	(2.3)
Multi-Component	340	(2.8)	275	(2.3)
Military Specification	340	(2.8)	275	(2.3)
Etching Filler	420	(3.5)	420	(3.5)
Solar-Absorbent	420	(3.5)	360	(3.0)
Heat-Resistant	420	(3.5)	360	(3.0)
Extreme High-Gloss	420	(3.5)	360	(3.0)
Metallic	420	(3.5)	420	(3.5)
Extreme Performance	420	(3.5)	360	(3.0)
Prefabricated Architectural Component	420	(3.5)	275	(2.3)
Touch Up	420	(3.5)	360	(3.0)
Repair	420	(3.5)	360	(3.0)
Silicone Release	420	(3.5)	420	(3.5)
High Performance Architectural	420	(3.5)	420	(3.5)
Camouflage	420	(3.5)	420	(3.5)
Vacuum-Metalizing	420	(3.5)	420	(3.5)
Mold-Seal	420	(3.5)	420	(3.5)
High-Temperature	420	(3.5)	420	(3.5)
Electric-Insulating Varnish	420	(3.5)	420	(3.5)
Pan Backing	420	(3.5)	420	(3.5)
Pretreatment Coatings	420	(3.5)	420	(3.5)

FACILITY PERMIT TO OPERATE
LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS
[RULE 1107 11-9-2001]

- (2) A person shall not use VOC-containing materials which have a VOC content of more than 200 grams per liter of material for stripping any coating governed by this rule.

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS [RULE 1113 11-8-1996]

- (1) Except as provided in paragraphs (c)(2), (c)(3), and (c)(4) of Rule 1113, the operator shall not supply, sell, offer for sale, apply, or solicit the application of, any architectural coating which, at the time of sale or manufacture, contains more than 250 grams of VOC per liter of coating (2.08 pounds per gallon), less water, less exempt compounds, and less any colorant added to tint bases, or manufacture, blend, or repackage such a coating for use within the District.
- (2) Except as provided in paragraphs (c)(3) and (c)(4) of Rule 1113, the operator shall not supply, sell, offer for sale, apply, solicit the application of, manufacture, blend, or repackage, for use within the District, any architectural coating listed in the Table of Standards which contains VOC (excluding any colorant added to tint bases) in excess of the corresponding VOC limit specified in the table, after the effective date specified.

TABLE OF STANDARDS

VOC LIMITS

**Grams of VOC Per Liter of Coating,
 Less Water And Less Exempt Compounds**

COATING	Limit*	Effective Date of Adoption	Effective 1/1/1998	Effective 1/1/1999	Effective 7/1/2001	Effective 1/1/2005	Effective 7/1/2008
Bond Breakers	350						
Clear Wood Finishes							
Varnish	350						
Sanding Sealers	350						
Lacquer	680		550			275	
Concrete-Curing Compounds	350						
Dry-Fog Coatings	400						
Fire-proofing Exterior	350	450		350			
Coatings							
Fire-Retardant Coatings							
Clear	650						
Pigmented	350						
Flats	250				100		50
Graphic Arts (Sign) Coatings	500						
Industrial Maintenance							

FACILITY PERMIT TO OPERATE

LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS [RULE 1113 11-8-1996]

Primers and Topcoats						
Alkyds	420					
Catalyzed Epoxy	420					
Bituminous Coatings	420					
Materials						
Inorganic Polymers	420					
Vinyl Chloride Polymers	420					
Chlorinated Rubber	420					
Acrylic Polymers	420					
Urethane Polymers	420					
Silicones	420					
Unique Vehicles	420					
Japans/Faux Finishing	350	700		350		
Coatings						
Magnesite Cement Coatings	600			450		
Mastic Coatings	300					
Metallic Pigmented Coatings	500					
Multi-Color Coatings	420		250			
Pigmented Lacquer	680		550		275	
Pre-Treatment Wash Primers	780					
Primers, Sealers, and	350					
Undercoaters						
Quick-Dry Enamels	400					
Roof Coatings	300					
Shellac						
Clear	730					
Pigmented	550					
Stains	350					
Swimming Pool Coatings						
Repair	650					
Other	340					
Traffic Coatings	250		150			
Waterproofing Sealers	400					
Wood Preservatives						
Below-Ground	350					
Other	350					

* The specified limits remain in effect unless revised limits are listed in subsequent columns in the Table of Standards

FACILITY PERMIT TO OPERATE
LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS
[RULE 1113 11-8-1996]

TABLE OF STANDARDS (cont.)

VOC LIMITS

Grams of VOC Per Liter of Material

COATING	Limit
Low-Solids Coating	120

FACILITY PERMIT TO OPERATE

LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS **[RULE 1113 7-13-2007]**

- (1) Except as provided in paragraphs (c)(2), (c)(3), (c)(4), and specified coatings averaged under (c)(6), no person shall supply, sell, offer for sale, manufacture, blend, or repackage any architectural coating for use in the District which, at the time of sale or manufacture, contains more than 250 grams of VOC per liter of coating (2.08 pounds per gallon), less water, less exempt compounds, and less any colorant added to tint bases, and no person shall apply or solicit the application of any architectural coating within the District that exceeds 250 grams of VOC per liter of coating as calculated in this paragraph.
- (2) Except as provided in paragraphs (c)(3), (c)(4), and designated coatings averaged under (c)(6), no person shall supply, sell, offer for sale, manufacture, blend, or repackage, for use within the District, any architectural coating listed in the Table of Standards which contains VOC (excluding any colorant added to tint bases) in excess of the corresponding VOC limit specified in the table, after the effective date specified, and no person shall apply or solicit the application of any architectural coating within the District that exceeds the VOC limit as specified in this paragraph. No person shall apply or solicit the application within the District of any industrial maintenance coatings, except anti-graffiti coatings, for residential use or for use in areas such as office space and meeting rooms of industrial, commercial or institutional facilities not exposed to such extreme environmental conditions described in the definition of industrial maintenance coatings; or of any rust-preventative coating for industrial use, unless such a rust preventative coating complies with the Industrial Maintenance Coating VOC limit specified in the Table of Standards.

FACILITY PERMIT TO OPERATE

LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS [RULE 1113 7-13-2007]

TABLE OF STANDARDS VOC LIMITS

Grams of VOC Per Liter of Coating,
 Less Water and Less Exempt Compounds

COATING CATEGORY	Ceiling Limit*	Current Limit	Effective Date					
			1/1/03	1/1/04	1/1/05	7/1/06	7/1/07	7/1/08
Bond Breakers	350							
Clear Wood Finishes	350					275		
Varnish	350					275		
Sanding Sealers	350					275		
Lacquer	680	550			275			
Clear Brushing Lacquer	680				275			
Concrete-Curing Compounds	350						100	
Concrete-Curing Compounds For Roadways and Bridges**	350							
Dry-Fog Coatings	400						150	
Fire-Proofing Exterior Coatings	450	350						
Fire-Retardant Coatings***								
Clear	650							
Pigmented	350							
Flats	250	100						50
Floor Coatings	420		100			50		
Graphic Arts (Sign) Coatings	500							
Industrial Maintenance (IM) Coatings	420			250		100		
High Temperature IM Coatings			420					
Zinc-Rich IM Primers	420		340			100		
Japans/Faux Finishing Coatings	700	350						
Magnesite Cement Coatings	600	450						
Mastic Coatings	300							
Metallic Pigmented Coatings	500							
Multi-Color Coatings	420	250						
Nonflat Coatings	250		150			50		
Nonflat High Gloss	250		150				50	

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS [RULE 1113 7-13-2007]

COATING CATEGORY	Ceiling Limit*	Current Limit	Effective Date					
			1/1/03	1/1/04	1/1/05	7/1/06	7/1/07	7/1/08
Pigmented Lacquer	680	550			275			
Pre-Treatment Wash Primers	780		420					
Primers, Sealers, and Undercoaters	350		200			100		
Quick-Dry Enamels	400		250			150	50	
Quick-Dry Primers, Sealers, and Undercoaters	350		200			100		
Recycled Coatings			250					
Roof Coatings	300		250		50			
Roof Coatings, Aluminum	500				100			
Roof Primers, Bituminous	350		350					
Rust Preventative Coatings	420		400			100		
Shellac								
Clear	730							
Pigmented	550							
Specialty Primers	350					250	100	
Stains	350		250				100	
Stains, Interior	250							
Swimming Pool Coatings								
Repair	650		340					
Other	340							
Traffic Coatings	250	150					100	
Waterproofing Sealers	400		250			100		
Waterproofing	400					100		
Concrete/Masonry Sealers								
Wood Preservatives								
Below-Ground	350							
Other	350							

* The specified limits remain in effect unless revised limits are listed in subsequent columns in the Table of Standards.

** Does not include compounds used for curbs and gutters, sidewalks, islands, driveways and other miscellaneous concrete areas.

*** The Fire-Retardant Coating category will be eliminated on January 1, 2007 and subsumed by the coating category for which they are formulated.

FACILITY PERMIT TO OPERATE
LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS
[RULE 1113 7-13-2007]

TABLE OF STANDARDS (cont.)
VOC LIMITS

Grams of VOC Per Liter of Material

COATING	Limit
Low Solids Coating	120

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS [RULE 1140 2-1-1980]

- (1) The operator shall not, if he complies with an applicable performance standard in section (b)(4) of Rule 1140, discharge into the atmosphere from any abrasive blasting any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:
 - (A) As dark or darker in shade as that designated as No. 2 on the Ringelmann Chart, as published by the United States Bureau of Mines, or
 - (B) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in (1)(A).
- (2) The operator shall not, if he is not complying with an applicable performance standard in section (b)(4) of Rule 1140, discharge into the atmosphere from any abrasive blasting any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:
 - (A) As dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or
 - (B) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in (2)(A).

FACILITY PERMIT TO OPERATE
LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS
[RULE 1140 8-2-1985]

- (1) The operator shall not, if he complies with an applicable performance standard in section (b)(4) of Rule 1140, discharge into the atmosphere from any abrasive blasting any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:
 - (A) As dark or darker in shade as that designated as No. 2 on the Ringelmann Chart, as published by the United States Bureau of Mines, or
 - (B) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in (1)(A).
- (2) The operator shall not, if he is not complying with an applicable performance standard in section (b)(4) of Rule 1140, discharge into the atmosphere from any abrasive blasting any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:
 - (A) As dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or
 - (B) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in (2)(A).

FACILITY PERMIT TO OPERATE

LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS [RULE 1171 11-7-2003]

(1) Solvent Requirements

A person shall not use a solvent to perform solvent cleaning operations unless the solvent complies with the applicable requirements set forth below:

SOLVENT CLEANING ACTIVITY	CURRENT LIMITS
	VOC g/l (lb/gal)
(A) Product Cleaning During Manufacturing Process Or Surface Preparation For Coating, Adhesive, Or Ink Application	
(i) General	25 (0.21)
(ii) Electrical Apparatus Components & Electronic Components	500 (4.2)
(iii) Medical Devices & Pharmaceuticals	800 (6.7)
(B) Repair and Maintenance Cleaning	
(i) General	25 (0.21)
(ii) Electrical Apparatus Components & Electronic Components	900 (7.5)
(iii) Medical Devices & Pharmaceuticals	
(A) Tools, Equipment, & Machinery	800 (6.7)
(B) General Work Surfaces	600 (5.0)

FACILITY PERMIT TO OPERATE

LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS [RULE 1171 11-7-2003]

SOLVENT CLEANING ACTIVITY	CURRENT LIMITS
	VOC g/l (lb/gal)
(C) Cleaning of Coatings or Adhesives Application Equipment	550 (4.6)
(D) Cleaning of Ink Application Equipment	
(i) General	25 (0.21)
(ii) Flexographic Printing	25 (0.21)
(iii) Gravure Printing	
(A) Publication	750 (6.3)
(B) Packaging	25 (0.21)
(iv) Lithographic or Letter Press Printing	
(A) Roller Wash – Step 1	600 (5.0)
(B) Roller Wash-Step 2, Blanket Wash, & On-Press Components	800 (6.7)
(C) Removable Press Components	25 (0.21)
(v) Screen Printing	750 (6.3)
(vi) Ultraviolet Ink/ Electron Beam Ink Application Equipment (except screen printing)	800 (6.7)

FACILITY PERMIT TO OPERATE
LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS
[RULE 1171 11-7-2003]

SOLVENT CLEANING ACTIVITY	CURRENT LIMITS
	VOC g/l (lb/gal)
(vii) Specialty Flexographic Printing	600 (5.0)
(E) Cleaning of Polyester Resin Application Equipment	25 (0.21)

FACILITY PERMIT TO OPERATE

LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS [RULE 1171 2-1-2008]

(1) Solvent Requirements

A person shall not use a solvent to perform solvent cleaning operations unless the solvent complies with the applicable requirements set forth below:

	CURRENT LIMITS*	EFFECTIVE 1/1/2008*	EFFECTIVE 1/1/2009
SOLVENT CLEANING ACTIVITY	VOC g/l (lb/gal)	VOC g/l (lb/gal)	VOC g/l (lb/gal)
(A) Product Cleaning During Manufacturing Process Or Surface Preparation For Coating, Adhesive, Or Ink Application			
(i) General	25 (0.21)		
(ii) Electrical Apparatus Components & Electronic Components	100 (0.83)		
(iii) Medical Devices & Pharmaceuticals	800 (6.7)		
(B) Repair and Maintenance Cleaning			
(i) General	25 (0.21)		
(ii) Electrical Apparatus Components & Electronic Components	100 (0.83)		

FACILITY PERMIT TO OPERATE

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APPENDIX B: RULE EMISSION LIMITS [RULE 1171 2-1-2008]

	CURRENT LIMITS*	EFFECTIVE 1/1/2008*	EFFECTIVE 1/1/2009
SOLVENT CLEANING ACTIVITY (cont.)	VOC g/l (lb/gal)	VOC g/l (lb/gal)	VOC g/l (lb/gal)
(iii) Medical Devices & Pharmaceuticals			
(A) Tools, Equipment, & Machinery	800 (6.7)		
(B) General Work Surfaces	600 (5.0)		
(C) Cleaning of Coatings or Adhesives Application Equipment	25 (0.21)		
(D) Cleaning of Ink Application Equipment			
(i) General	25 (0.21)		
(ii) Flexographic Printing	25 (0.21)		
(iii) Gravure Printing			
(A) Publication	100 (0.83)		
(B) Packaging	25 (0.21)		
(iv) Lithographic (Offset) or Letter Press Printing			
(A) Roller Wash, Blanket Wash, & On-Press Components			
(I) Newsprint	100 (0.83)		

FACILITY PERMIT TO OPERATE **LA CITY, DWP VALLEY GENERATING STATION**

APPENDIX B: RULE EMISSION LIMITS **[RULE 1171 2-1-2008]**

	CURRENT LIMITS*	EFFECTIVE 1/1/2008*	EFFECTIVE 1/1/2009
SOLVENT CLEANING ACTIVITY (cont.)	VOC g/l (lb/gal)	VOC g/l (lb/gal)	VOC g/l (lb/gal)
(II) Other Substrates	500 (4.2)	100 (0.83)	
(B) Removable Press Components	25 (0.21)		
(v) Screen Printing	500 (4.2)	100 (0.83)	
(vi) Ultraviolet Ink/ Electron Beam Ink Application Equipment (except screen printing)	650 (5.4)	650 (5.4)	100 (0.83)
(vii) Specialty Flexographic Printing	100 (0.83)		
(E) Cleaning of Polyester Resin Application Equipment	25 (0.21)		

* The specified limits remain in effect unless revised limits are listed in subsequent columns.

FACILITY PERMIT TO OPERATE

LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS [RULE 404 2-7-1986]

The operator shall not discharge into the atmosphere from this equipment, particulate matter in excess of the concentration at standard conditions, shown in Table 404(a).

Where the volume discharged is between figures listed in the Table, the exact concentration permitted to be discharged shall be determined by linear interpolation.

For the purposes of this rule, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.

TABLE 404(a)

Volume Discharged Calculated as Dry Gas At Standard Conditions		Maximum Concentration of Particulate Matter ² Allowed in Discharged Gas Calculated as Dry Gas at Standard Conditions		Volume Discharged Calculated as Dry Gas At Standard Conditions		Maximum Concentration of Particulate Matter Allowed in Discharged Gas Calculated as Dry Gas at Standard Conditions	
Cubic meters Per Minute	Cubic feet Per Minute	Milligrams per Cubic Meter	Grains per Cubic Foot	Cubic meters Per Minute	Cubic feet Per Minute	Milligrams per Cubic Meter	Grains per Cubic Foot
25 or less	883 or less	450	0.196	900	31780	118	0.0515
30	1059	420	.183	1000	35310	113	.0493
35	1236	397	.173	1100	38850	109	.0476
40	1413	377	.165	1200	42380	106	.0463
45	1589	361	.158	1300	45910	102	.0445
50	1766	347	.152	1400	49440	100	.0437
60	2119	324	.141	1500	52970	97	.0424
70	2472	306	.134	1750	61800	92	.0402

FACILITY PERMIT TO OPERATE

LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS [RULE 404 2-7-1986]

Volume Discharged Calculated as Dry Gas At Standard Conditions		Maximum Concentration of Particulate Matter Allowed in Discharged Gas Calculated as Dry Gas at Standard Conditions		Volume Discharged Calculated as Dry Gas At Standard Conditions		Maximum Concentration of Particulate Matter Allowed in Discharged Gas Calculated as Dry Gas at Standard Conditions	
Cubic meters Per Minute	Cubic feet Per Minute	Milligrams per Cubic Meter	Grains per Cubic Foot	Cubic meters Per Minute	Cubic feet Per Minute	Milligrams per Cubic Meter	Grains per Cubic Foot
80	2825	291	.127	2000	70630	87	.0380
90	3178	279	.122	2250	79460	83	.0362
100	3531	267	.117	2500	88290	80	.0349
125	4414	246	.107	3000	105900	75	.0327
150	5297	230	.100	4000	141300	67	.0293
175	6180	217	.0947	5000	176600	62	.0271
200	7063	206	.0900	6000	211900	58	.0253
250	8829	190	.0830	8000	282500	52	.0227
300	10590	177	.0773	10000	353100	48	.0210
350	12360	167	.0730	15000	529700	41	.0179
400	14130	159	.0694	20000	706300	37	.0162
450	15890	152	.0664	25000	882900	34	.0148
500	17660	146	.0637	30000	1059000	32	.0140
600	21190	137	.0598	40000	1413000	28	.0122
700	24720	129	.0563	50000	1766000	26	.0114
800	28250	123	.0537	70000 or more	2472000 or more	23	.0100

FACILITY PERMIT TO OPERATE

LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS [RULE 405 2-7-1986]

The operator shall not discharge into the atmosphere from this equipment, solid particulate matter including lead and lead compounds in excess of the rate shown in Table 405(a).

Where the process weight per hour is between figures listed in the table, the exact weight of permitted discharge shall be determined by linear interpolation.

For the purposes of this rule, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.

TABLE 405(a)

Process Weight Per Hour		Maximum Discharge Rate Allowed for Solid Particulate Matter (Aggregate Discharged From All Points of Process)		Process Weight Per Hour		Maximum Discharge Rate Allowed for Solid Particulate Matter (Aggregate Discharged From All points of Process)	
Kilograms Per Hour	Pounds Per Hour	Kilograms Per Hour	Pounds Per Hour	Kilograms Per Hour	Pounds Per Hour	Kilograms Per Hour	Pounds Per Hour
100 or less	220 or less	0.450	0.99	9000	19840	5.308	11.7
150	331	0.585	1.29	10000	22050	5.440	12.0
200	441	0.703	1.55	12500	27560	5.732	12.6
250	551	0.804	1.77	15000	33070	5.982	13.2
300	661	0.897	1.98	17500	38580	6.202	13.7
350	772	0.983	2.17	20000	44090	6.399	14.1
400	882	1.063	2.34	25000	55120	6.743	14.9
450	992	1.138	2.51	30000	66140	7.037	15.5
500	1102	1.209	2.67	35000	77160	7.296	16.1
600	1323	1.340	2.95	40000	88180	7.527	16.6
700	1543	1.461	3.22	45000	99210	7.738	17.1
800	1764	1.573	3.47	50000	110200	7.931	17.5
900	1984	1.678	3.70	60000	132300	8.277	18.2
1000	2205	1.777	3.92	70000	154300	8.582	18.9

FACILITY PERMIT TO OPERATE

LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS [RULE 405 2-7-1986]

Process Weight Per Hour		Maximum Discharge Rate Allowed for Solid Particulate Matter (Aggregate Discharged From All Points of Process)		Process Weight Per Hour		Maximum Discharge Rate Allowed for Solid Particulate Matter (Aggregate Discharged From All points of Process)	
Kilograms Per Hour	Pounds Per Hour	Kilograms Per Hour	Pounds Per Hour	Kilograms Per Hour	Pounds Per Hour	Kilograms Per Hour	Pounds Per Hour
1250	2756	2.003	4.42	80000	176400	8.854	19.5
1500	3307	2.206	4.86	90000	198400	9.102	20.1
1750	3858	2.392	5.27	100000	220500	9.329	20.6
2000	4409	2.563	5.65	125000	275600	9.830	21.7
2250	4960	2.723	6.00	150000	330700	10.26	22.6
2500	5512	2.874	6.34	175000	385800	10.64	23.5
2750	6063	3.016	6.65	200000	440900	10.97	24.2
3000	6614	3.151	6.95	225000	496000	11.28	24.9
3250	7165	3.280	7.23	250000	551200	11.56	25.5
3600	7716	3.404	7.50	275000	606300	11.82	26.1
4000	8818	3.637	8.02	300000	661400	12.07	26.6
4500	9921	3.855	8.50	325000	716500	12.30	27.1
5000	11020	4.059	8.95	350000	771600	12.51	27.6
6000	13230	4.434	9.78	400000	881800	12.91	28.5
7000	15430	4.775	10.5	450000	992100	13.27	29.3
8000	17640	5.089	11.2	500000 or more	1102000 or more	13.60	30.0

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS [RULE 461, Bellowsless Conditions 3-7-2008]

GASOLINE TRANSFER AND DISPENSING, BELLOWS-LESS CONDITIONS

Condition number 1 shall not apply to Healy G-70-186 and G-70-187, Hasstech G-70-164 and G-70-175, and Hirt G-70-177 and G-70-181.

1. The Phase II vapor recovery system shall be installed, operated, and maintained such that the maximum allowable pressure through the riser, and underground piping does not exceed the dynamic back pressure described by the California Air Resources Board Executive Order by which the system was certified:

Nitrogen Flowrates
(CFH)
60

Dynamic Back Pressure
(Inches of Water)
0.50

Dynamic back pressure tests shall be conducted as a performance test to determine the Phase II system vapor recovery back pressures. The tests shall be conducted in accordance with CARB Test Procedure TP-201.4, Methodology 4 (July 3, 2002); as a performance test. This test shall be a one-time test and the results kept permanently on site. Results shall be submitted to the AQMD, office of engineering and compliance, within seventy-two (72) hours of tests.

2. The AQMD shall be notified by e-mail at r461testing@AQMD.gov or by facsimile at telephone number (909) 396-3606 at least seventy-two (72) hours prior to any of the above mentioned testing requirements. Such notification shall include the name of the owner or operator; the name of the contractor; the location of the facility; and the scheduled start and completion dates of the tests to be performed.
3. The testing for the above mentioned tests shall be conducted in accordance with the most recent Rule 461 amendment or CARB Executive Order requirements, whichever is more stringent.
4. All records and test results that are required to be maintained by Rule 461 shall be kept on site for four years and made available to District representatives upon request.

FACILITY PERMIT TO OPERATE

LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS **[RULE 461, Healy, Phase I and II EVR Conditions 3-7-2008]**

GASOLINE TRANSFER AND DISPENSING, HEALY PHASE I AND PHASE II **EVR CONDITIONS**

1. The District at its discretion may wish to witness the installation and/or performance testing of the Healy Phase II EVR system not including ISD. At least seventy-two (72) hours prior to the installation and performance testing of the Healy Phase II EVR system not including ISD, the applicant shall notify the AQMD at telephone number (866) 770-9140.
2. At least seventy-two (72) hours prior to back-filling any underground storage tank or piping, the AQMD shall be notified by e-mail at r461backfill@aqmd.gov or by facsimile at telephone number (909) 396-3606. Such notification shall include the name of the owner or operator; the name of the contractors; the location of the facility; and the scheduled start and completion dates of the back-filling procedure. The back-filling procedure shall not commence until inspected by a District representative.
3. Depending on the system configuration, a leak rate test of drop tube/drain valve assembly shall be conducted to quantify the pressure integrity of both the drop tube and drain valve seal or a leak rate test of drop tube overfill prevention device and drain valve shall be conducted to quantify the pressure integrity of the drop tube overfill prevention device and the pressure integrity of the spill container drain valve. Either test shall be conducted as a performance test and as a reverification test. The test shall be conducted in accordance with Test Procedure Method TP-201.1C (October 8, 2003) or TP-201.1D (October 8, 2003), respectively. Results shall be submitted to the AQMD, Office of Engineering and Compliance, within seventy-two (72) hours of test.
4. A leak rate and cracking pressure test of pressure/vacuum relief vent valves shall be conducted within thirty days (30) after the start of operation of the Healy Phase I EVR equipment and at least once every three (3) years thereafter to determine the pressure and vacuum at which the pressure/vacuum vent valve actuates, and to determine the volumetric leak rate at a given pressure. The test shall be conducted in accordance with the Test Procedure Method TP-201.1E (October 8, 2003). Results shall be submitted to the AQMD, Office of Engineering and Compliance, within seventy-two (72) hours of test. This test result shall be kept on site for three (3) years and made available to District representatives upon request.
5. A static torque test of rotatable Phase I adaptors shall be conducted to quantify the amount of static torque required to start the rotation of the rotatable Phase I adaptors. The test shall be conducted in accordance with the Test Procedure Method outlined in TP-201.1B (October 8, 2003) as a performance test and as a reverification test. Results shall be submitted to the AQMD, Office of Engineering and Compliance, within seventy-two (72) hours of test.

FACILITY PERMIT TO OPERATE

LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS **[RULE 461, Healy, Phase I and II EVR Conditions 3-7-2008]**

6. A static pressure performance test for the Healy clean air separator using both the vacuum decay procedure and the positive pressure procedure shall be conducted to quantify the vapor tightness of the Healy clean air separator tank pressure management system. These tests shall be conducted in accordance with Exhibit 4 of CARB Executive Order VR-201-H, as a performance test and as a reverification test. Results shall be submitted to the AQMD, Office of Engineering and Compliance within seventy-two (72) hours of test.
7. A vapor to liquid volume ratio test shall be conducted to quantify the vapor to liquid (v/l) volumetric ratio of the Healy clean air separator system. The test shall be conducted in accordance with Exhibit 5 of CARB Executive Order VR-201-H, as a performance test and as a reverification test. Results shall be submitted to the AQMD, Office of Engineering and Compliance within seventy-two (72) hours of test.
8. A nozzle bag test shall be conducted on the Healy Phase II EVR nozzles to verify the integrity of the vapor valve. The test shall be conducted on any newly installed or replaced Healy Phase II EVR nozzles and in accordance with Exhibit 7 of CARB Executive Order VR-201-H. Results shall be submitted to the AQMD, Office of Engineering and Compliance within seventy-two (72) hours of test.
9. The static pressure leak decay test TP-201.3, shall be conducted in accordance with Exhibit 8 of CARB Executive Order VR-201-H. Verification of completing each step as outlined shall be documented by submitting a copy of Exhibit 8 to the AQMD, Office of Engineering and Compliance within seventy-two (72) hours of test.
10. Unless AQMD Rule 461 requires a more frequent testing or inspection schedule, the owner/operator shall be responsible to perform the scheduled weekly, quarterly, and annual inspections as outlined in the ARB approved installation, operation, and maintenance manual for the Healy Phase II EVR systems, as well as all the required vapor recovery system tests as per the current and appropriate ARB Executive Order.
11. A CARB certified Phase II enhanced vapor recovery system shall be fully permitted, installed, and tested by October 1, 2008. Failure to achieve this condition by October 1, 2008, shall result in the owner/operator to file a District approved compliance plan outlining the increments of progress towards completing the installation of a CARB certified Phase II enhanced vapor recovery system by April 1, 2009.
12. If the owner/operator plans to permanently cease all gasoline dispensing operations before April 1, 2009, a compliance plan shall be filed declaring to irrevocably surrender their Permit to Operate.

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS [RULE 461, Healy, Phase I and II EVR Conditions 3-7-2008]

13. The AQMD shall be notified by e-mail at r461testing@aqmd.gov or by facsimile at telephone number (909) 396-3606 at least seventy-two (72) hours prior to any of the above mentioned testing requirements. Such notification shall include the name of the owner or operator; the name of the contractor; the location of the facility; and the scheduled start and completion dates of the tests to be performed.
14. The testing for the above mentioned tests shall be conducted in accordance with the most recent Rule 461 amendment or CARB Executive Order requirements, whichever is more stringent.
15. All records and test results that are required to be maintained by Rule 461 shall be kept on site for four years and made available to District representatives upon request.
16. Should the facility dispense more than 600,000 gallons of gasoline per calendar year and if the facility undergoes a major modification as defined by CARB's advisory letter number 336, "enhanced vapor recovery implementation update" dated April 15, 2005; the operator shall immediately cease all gasoline dispensing operations and file an application for a new permit to construct/operate to install a CARB certified ISD system. Gasoline dispensing operations shall not resume until the ISD system has been granted a permit to construct/operate and has been fully installed, tested, and operative.
17. Should the facility dispense more than 600,000 gallons of gasoline in any calendar year and if the facility does not undergo a major modification as defined by CARB's advisory letter number 336, "enhanced vapor recovery implementation update" dated April 15, 2005; the operator shall file an application for a new permit to construct/operate to install a CARB certified ISD system. The ISD system shall be fully installed, tested, and operative based on the following table:

<u>Gasoline Throughput Per Calendar Year</u>	<u>Date</u>
Greater than 1.8 million gallons	September 1, 2009
Between 600,000 and 1.8 million gallons	September 1, 2010

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS [RULE 461, Universal Conditions 3-7-2008]

GASOLINE TRANSFER AND DISPENSING, UNIVERSAL CONDITIONS

1. Operation of this equipment shall be in compliance with all data and specifications submitted with the application under which this permit was issued, unless otherwise noted below.
2. This equipment shall be properly maintained and kept in good operating condition at all times.
3. All permit conditions applicable to the equipment described in the previous Permit to Operate shall remain in effect until the new or modified equipment is constructed and operated as described in this new permit. This Permit to Construct/Operate shall become invalid if the modification as described in the equipment description has not been completed within one year from the issue date. If the modification has not been completed within one year from the issue date of the permit, a written request shall be submitted to the AQMD (Attention: Randy Matsuyama) to reinstate the previously inactivated permit to operate. A new application shall be filed if there are plans to continue with the modification. Furthermore, this condition does not allow any time extensions to any modifications required by the California Air Resources Board or AQMD.
4. Except for diesel transfers, Phase I vapor recovery systems shall be in full operation whenever fuel is being transferred into storage tanks.
5. Except for diesel transfers, Phase II vapor recovery systems shall be in full operation whenever fuel is being transferred into motor vehicles, as defined in Rule 461.
6. All Phase I and Phase II vapor recovery equipment at this facility shall be installed, operated and maintained to meet all California Air Resources Board certification requirements.
7. New equipment installations and subsequent service and repairs for any certified component for which this permit was issued, shall only be performed by a current and certified person who has successfully completed the manufacturer's training course and appropriate International Code Council (ICC) certification or CARB equivalent training. Completion of any AQMD training course does not constitute as a substitute for this requirement. Proof of successful completion of any manufacturer training course shall be with the manufacturer.
8. Except for HIRT VCS 400-7 equipment, a static pressure leak decay test shall be conducted to demonstrate that the storage tanks, the remote and/or nozzle vapor recovery check valves, associated vapor return piping and fittings are free from vapor leaks. The test shall be conducted in accordance with CARB Test Procedure Method TP-201.3 (March 17, 1999) as a performance test and as a reverification test. Results shall be submitted to the AQMD, Office of Engineering and Compliance, within seventy-two (72) hours of test.

FACILITY PERMIT TO OPERATE LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS [RULE 461, Universal Conditions 3-7-2008]

9. The AQMD shall be notified by e-mail at r461testing@aqmd.gov or by facsimile at telephone number (909) 396-3606 at least seventy-two (72) hours prior to testing. Such notification shall include the name of the owner or operator; the name of the contractor; the location of the facility; and the scheduled start and completion dates of the static pressure leak decay test.
10. The testing for the above mentioned tests shall be conducted in accordance with the most recent Rule 461 amendment or CARB Executive Order requirements, whichever is more stringent.
11. All records and test results that are required to be maintained by Rule 461 shall be kept on site and made available to district representatives upon request.

FACILITY PERMIT TO OPERATE

LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS **[40CFR 72 - Acid Rain Provisions 11-24-1997]**

1. A Title V permit revision is not required for emission increases that are authorized by allowances acquired under the Acid Rain Program, provided that the increases do not trigger a Title V permit revision under any other applicable requirement. [70.6 (a)(4)(ii)]

Monitoring Requirements

2. The owners and operators and, to the extent applicable, the designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR Parts 74, 75, and 76. [40 CFR 72.50, 72.31, 72.9(b)(1)]
3. The emissions measurements recorded and reported in accordance with 40 CFR Part 75 shall be used to determine compliance by the unit with the acid rain emissions limitations and emissions reduction requirements for sulfur dioxide (SO₂) under the Acid Rain Program. [40 CFR 72.9(b)(2), 40 CFR 75.2]
4. The requirements of 40 CFR Parts 74 and 75 shall not affect the responsibility of the operator to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements and other provisions of this permit. [40 CFR 72.9(b)(3), 40 CFR 72.5]

Sulfur Dioxide Requirements

5. The owners and operators of each source and each affected unit at the source shall:
 - (A) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR Part 73, Section 73.34(C)) not less than the total annual emissions of SO₂ for the previous calendar year from the unit; and, [40 CFR 72.9(c)(i)],
 - (B) Comply with the applicable acid rain emissions limitations for SO₂. [40 CFR 72.9(c)(ii)]
6. Each ton of SO₂ emitted in excess of the acid rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act. [40 CFR 72.9(g)(7)]
7. SO₂ allowances shall be held in, deducted from, or transferred among allowance tracking system accounts in accordance with the Acid Rain Program. [40 CFR 72.9(g)(4)]

FACILITY PERMIT TO OPERATE

LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS

[40CFR 72 - Acid Rain Provisions 11-24-1997]

8. A SO₂ allowance shall not be deducted in order to comply with the requirements under paragraph 41(A) of the SO₂ requirements prior to the calendar year for which the allowance was allocated. [40 CFR 72.9(g)(5)]
9. An affected unit shall be subject to the SO₂ requirements under the Acid Rain Program as follows:[40 CFR 72.6(a)]
 - (A) Starting January 1, 2000, an affected unit under 40 CFR Part 72, Section 72.6(a)(2); or [40 CFR 72.6(a)(2)]
 - (B) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR Part 75, an affected unit under 40 CFR Part 72, Section 72.6(a)(3). [40CFR 72.6(a)(3)]
10. An allowance allocated by the EPA administrator under the Acid Rain Program is a limited authorization to emit SO₂ in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the acid rain permit application, the acid rain permit, or the written exemption under 40 CFR Part 72, Sections 72.7, 72.8, or 72.14, and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization. [40 CFR 72.9 (c)(6)]
11. An allowance allocated by the EPA Administrator under the Acid Rain Program does not constitute a property right. [40 CFR 72.9(c)(7)]

Excess Emissions Requirements

12. The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR Part 77. [40 CFR 72.9(e)]
13. The owners and operators of an affected unit that has excess emissions in any calendar year shall: [40 CFR 72.9(e)(2)]
 - (A) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR Part 77; and[40 CFR 72.9(e)(2)(i)]
 - (B) Comply with the terms of an approved offset plan, as required by 40 CFR Part 77. [40 CFR 72.9(e)(2)(ii)]

FACILITY PERMIT TO OPERATE

LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS **[40CFR 72 - Acid Rain Provisions 11-24-1997]**

Recordkeeping and Reporting Requirements

14. Unless otherwise provided, the owners and operators of the source and each affected unit at the source that are subject to the acid rain provisions under Title IV shall keep on site at the source each of the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the EPA Administrator or the Executive Officer: [40 CFR 72.9(f)(1)]
- (A) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such five year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative; [40 CFR 72.9(f)(1)(i)]
- (B) All emissions monitoring information, in accordance with 40 CFR Part 75; [40 CFR 72.9(f)(1)(ii)]
- (C) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and, [40 CFR 72.9(f)(1)(iii)]
- (D) Copies of all documents used to complete an acid rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program. [40 CFR 72.9(f)(1)(iv)]
15. The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR Part 72 Subpart I and 40 CFR Part 75. [40 CFR 72.9(f)(2)]

Liability

16. Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete acid rain permit application, an acid rain permit, or a written exemption under 40 CFR Part 72, Sections 72.7, 72.8, or 72.14, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to Section 113(c) of the Act. [40 CFR 72.9 (g)(1)]

FACILITY PERMIT TO OPERATE

LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS **[40CFR 72 - Acid Rain Provisions 11-24-1997]**

17. Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to Section 113(c) of the Act and 18 U.S.C. 1001. [40 CFR 72.9 (g)(2)]
18. No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect. [40 CFR 72.9 (g)(3)]
19. Each affected source and each affected unit shall meet the requirements of the Acid Rain Program. [40 CFR 72.9 (g)(4)]
20. Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source. [40 CFR 72.9 (g)(5)]
21. Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR Part 72, Section 72.44 (Phase II repowering extension plans) and 40 CFR Part 76, Section 76.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR Part 75 (including 40 CFR Part 75, Sections 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one affected unit shall not be liable for any violation by any other affected unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative. [40 CFR 72.9 (g)(6)]
22. Each violation of a provision of 40 CFR Parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act. [40 CFR 72.9 (g)(7)]

Effect on Other Authorities

23. No provision of the Acid Rain Program, an acid rain permit application, an acid rain permit, or a written exemption under 40 CFR Part 72, Sections 72.7, 72.8, or 72.14 shall be construed as: [40 CFR 72.9 (h)]

FACILITY PERMIT TO OPERATE

LA CITY, DWP VALLEY GENERATING STATION

APPENDIX B: RULE EMISSION LIMITS **[40CFR 72 - Acid Rain Provisions 11-24-1997]**

- (A) Except as expressly provided in Title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of Title I of the Act relating to applicable National Ambient Air Quality Standards or state implementation plans; [40 CFR 72.9 (h)(1)]
- (B) Limiting the number of allowances a unit can hold; *provided*, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act; [40 CFR 72.9 (h)(2)]
- (C) Requiring a change of any kind in any state law regulating electric utility rates and charges, affecting any state law regarding such state regulation, or limiting such state regulation, including any prudence review requirements under such state law; [40 CFR 72.9 (h)(3)]
- (D) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or, [40 CFR 72.9 (h)(4)]
- (E) Interfering with or impairing any program for competitive bidding for power supply in a state in which such program is established. [40 CFR 72.9 (h)(5)]

Chandrashekhar Bhatt

From: Shaffer, Mike
Sent: Tuesday, January 06, 2009 6:48 PM
To: Chandrashekhar Bhatt
Subject: Re: SHP Turbine Mass Emission Limits

Chandra,

After your done with the compressor application, you'll probably start working on SHP's turbine application (A/N 492565 (and 492566 for RECLAIM permit amendment)). I wanted to let you know that during their last source test on December 3, 2008 (retest under variance since the VOC was above 2ppm permit limit during initial test), the results were:

Sample A - 0.55 ppm @ 15% O2

Sample B - 0.93 ppm @ 15% O2

[Note: The ambient VOC sample was 10 ppm as C1 (Source tester, Rich Vacherot of Horizon, was supposed to prepare a letter to include with the report that discusses the ambient VOC).]

You should be getting a copy of the report soon. I also wanted to let you know that in the permit application (submitted prior to the retest), I left the VOC emission factor in Condition A63.1 at the 2ppm limit....just adjusted it slightly to reflect the adjustment in the revised max. fuel consumption rate for the turbine. You'll see when you open up the file and start working on it.

Take Care.

Mike

----- Original Message -----

From: Mike Shaffer
To: C. S. Bhatt - SCAQMD
Cc: Ivan J. Tether ; Jim Lee - SHP
Sent: Wednesday, November 12, 2008 5:17 PM
Subject: Re: SHP Turbine Mass Emission Limits

Chandra,

Here's an update on where we stand regarding the SHP turbine and it's emissions and Condition A63.1. As mentioned in my previous e-mail (10/28/08, below), we discovered that the turbine's fuel usage was being calculated incorrectly using the following conversion formula: $SCFH @ 68^{\circ}F = [("X" \text{ lbs/hr fuel gas})(386 \text{ dscf/lb-mole})/(17.2 \text{ lb/lb-mole})]$. There were a few errors in the formula, namely the molecular weight (MW) of the gas being used as fuel in the turbine....it was much higher than the 17.2 lb/lb-mole MW that represents pipeline-quality natural gas. In addition, I just talked with Scott Wilson today and since Condition A63.1 is referenced against Rule 1303 (not RECLAIM or a Federal regulation), the standard temperature should be 60°F. Therefore the molar volume (Mv) should be expressed as 379 dscf/lb-mole. Taking all of this into consideration, the fuel flow conversion equation should be:

$SCFH @ 60^{\circ}F = [("X" \text{ lbs/hr fuel gas})(379 \text{ dscf/lb-mole})/(MW \text{ of gas lb/lb-mole})]$

SHP has taken 5 samples of the turbine's fuel gas over the last 2 years and the MW ranges between 21.238 and 21.733 lb/lb-mole (see attached spreadsheet....I can fax you the actual lab (Strata) analytical results if you want them....copies will be included in the permit application). For the purposes of calculating the fuel gas flow, the lowest MW value (21.238 lb/lb-mole) was selected since it yields the most conservative results (i.e., highest gas usage values). After the correction was made to the conversion formula, the emissions were recalculated for the entire operating period (July 2004 to present) using the EFs in Condition A63.1 (PM10: 6.94 lbs/mmscf, VOC: 2.92 lbs/mmscf, SOx: 2.01 lbs/mmscf, CO: 41.60 lbs/mmscf). The results of the recalculation identified that there

1/16/2009

have been **NO EXCEEDANCES** of the Condition A63.1 limits. Jim Lee will forward a spreadsheet with the revised emission totals probably tomorrow.

SHP is currently finalizing a permit application to modify the turbine. The application should be submitted very shortly and will request the following changes:

1. Increase the turbine's 62.68 MMBTU/hr fuel input rating to incorporate the reduced efficiencies due to the SCR system. New rating will be based on the actual maximum fuel usage based on 4 years of data plus an additional 10%. The power output rating (5.651 MW) will remain unchanged since the turbine's power output has not changed.
2. Revise the PTE limits in Condition A63.1 to more closely reflect actual PTE emissions pursuant to 2005 and 2008 source test results. [Note: The values will be significantly lower than the current limit values.]
3. Revise the emission factors in Condition A63.1 to more closely reflect actual emission rates.
4. Revise some of the language in Conditions A63.1, A99.1 and A99.2 to remove outdated references to the turbine's initial commissioning.

That should do it. Call me if you need anything else. The permit application should be on your desk shortly.

Mike Shaffer
Shaffer Environmental Consulting
(805) 659-1744 office
(805) 207-1945 cell
(805) 435-1634 fax
shafferenv@pacbell.net

----- Original Message -----

From: Mike Shaffer
To: C. S. Bhatt - SCAQMD
Cc: Ivan J. Tether ; Jim Lee - SHP
Sent: Tuesday, October 28, 2008 6:14 PM
Subject: Re: SHP Turbine Mass Emission Limits

Chandra,

GOOD NEWS!! While I was in the process of preparing SHP's turbine permit modification application, I discovered an error in the conversion calculation for the turbine's fuel gas meter. SHP's fuel meter is a mass flow meter that provides the mass of gas (in pounds) instead of volume. A simple conversion using the standard molar volume of a gas (M_v) and molecular weight (MW) of the fuel gas yields the volume. However, it appears that the conversion formula SHP was using contained an incorrect MW for the gas (pipeline quality gas instead of produced/purchased "mix" gas), which resulted in predicted gas volumes 20% higher than actual. As a result of this error, the resulting emissions of PM_{10} , VOC and SO_x were also elevated by over 20% since they were calculated using fuel usage-dependent emission factors (lbs/MMscf).

Old Conversion Equation

$SCFH @ 68^\circ F = [(X \text{ "lbs/hr fuel gas})(386 \text{ dscf/lb-mole})/(17.2 \text{ lb/lb-mole})]$

Revised Conversion Equation

$SCFH @ 68^\circ F = [(X \text{ "lbs/hr fuel gas})(385.3 \text{ dscf/lb-mole})/(21.4 \text{ lb/lb-mole})]$

{Question for you....should we use 379 dscf/lb-mole (60F) since these are non-RECLAIM pollutants?}

The table below illustrates the difference between the two conversion formulas for the turbine's three highest fuel usage months.

Date	Fuel Rate (scf/hr)	Fuel Rate (mmscf)	PM10 (lbs/mo)	VOC (lbs/mo)	SOX (lbs/mo)
Previous					
MAR-07	71,165.76	52.95	367	155	106
APR-07	73,783.23	53.12	369	155	107
DEC-07	72,603.35	54.02	375	158	109
Corrected					
MAR-07	57,094.92	41.11	285.3	120.0	82.6
APR-07	59,194.87	42.62	295.8	124.5	85.7
DEC-07	58,248.27	43.34	300.8	126.5	87.1
Cond. A63.1 Limits			298	125	87

The revised emission values still show an exceedance for December 2007, but that is merely due to the fact that the limits were calculated based on a 30-day month and not a 31-day month. This is also evident since the highest hourly fuel rate 59,195 scf/hr (April 2007) is below the maximum fuel rate used in the original permit to generate the emission limits (59,600 scf/hr).

What SHP proposes to do at this point is to submit a revision to the permit in order to correct/amend the following items in the facility permit:

1. Increase the turbine's 62.68 MMBTU/hr fuel input rating (to incorporate actual data and the reduced efficiencies due to the SCR system). The power output rating will remain unchanged since the turbine's power output characteristics have not been changed.
2. Revise/reduce the PTE limits in Condition A63.1 to more closely reflect actual PTE emissions pursuant to 2005 and 2008 source test results.
3. Revise the emission factors in Condition A63.1 to more closely reflect actual emission rates.

Regarding the last two items, I will propose to incorporate a safety factor into the calculations since we are dealing with actual testing data to develop the revised EFs and monthly mass emission limits. Both the EFs and limits will be significantly lower than the original values in the permit, so this shouldn't create any problems.

Since the Rule 1401 HAP/toxic emissions are calculated using emission factors based on fuel usage/heat content (lbs/MMBTU), SHP will provide revised HAP/toxic emission estimates and a revised Rule 1401 health risk assessment to support the original permit application's non-significant risk results.

Let me know what you think of this approach and/or if you'd like the application prepared differently. Right now we are planning to submit it as a permit modification/alteration (full fee) as opposed to a change of condition since there are changes to the original emissions. SHP will also include an additional 50% fee for expedite processing since, as shown above, the turbine can operate close to the max. fuel rate (59,600 scf/hr) used in to generate the Cond. A63.1 limits, and the 30-day vs. 31-day issue could also cause a problem (i.e., similar to Dec 2007).

Thanks and Take Care.

Mike Shaffer
Shaffer Environmental Consulting
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(805) 207-1945 cell
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shafferenv@pacbell.net

|----- Original Message -----

From: Mike Shaffer
To: C. S. Bhatt - SCAQMD
Cc: Jim Lee - SHP
Sent: Friday, October 17, 2008 11:07 AM
Subject: SHP Turbine Mass Emission Limits

Chandra,

As I mentioned to you a few weeks ago, I was planning to include in the compressor upgrade/vapor recovery application follow-up submittal, a request to modify/change SHP's gas turbine (D115) emission factors in Condition A63.1. The emission factors that were used to calculate the monthly mass emission limits were generated during our initial permitting efforts based on theoretical data/assumptions (fuel usage, turbine efficiency, emission concentration estimates and default factors). In addition, the exhaust/catalyst modifications that were made pursuant to the NOx spiking variance (diffuser added to distribute the exhaust flow more uniformly across the catalyst bed) resulted in additional restriction to the exhaust flow and decreased efficiency for the turbine (and simultaneously the fuel consumption rate increased). Based on the most recent source testing results (10/23/05 & 1/27/06, summaries attached), it is evident that the emission factors in A63.1 are very conservative and the fuel usage of the turbine is greater than the predicted maximum (0.0596 mmscf/hr). The maximum fuel consumption rate is closer to 0.073 mmscf/hr, and the resulting emissions are well below the limits stated in A63.1 as shown in the table below.

Pollutant	Source Test Results @ 100% Load				Permit Limits		
	Stack Conc. @15% O ₂ (ppmv)*	Emission Rate (lbs/hr)	31-Day Monthly Emissions (lbs/mo)	EF** (lbs/mmscf)	31-Day Monthly Emissions (lbs/mo)	EF (lbs/mmscf)	Stack @ O ₂ (ppmv)
NOx	3.1	0.48	357.12	7.06	NA	NA	
CO	<1	<0.1	<74.4	<1.47	<660	NA	
PM10	0.00126	0.23	171.12	3.38	<298	6.94	
VOC	0.155	0.008	5.95	0.12	<125	2.92	
SOX	<0.1	<0.02	<14.88	<0.29	<87	2.01	

* PM10 units are gr/dscf (not ppmv)

** based on fuel consumption rate of 0.068 mmscf/hr

I will separate the two permit applications (turbine change of condition & compressor/VRU follow-up) and submit each to your attention ASAP. The turbine change of condition application was simply asking for the EFs to be changed to reflect values that are more in-line with the actual source test results. By not changing the monthly mass emission limits in the A63.1 table, then there should not be any NSR implications. Please call or e-mail me if you have any questions or comments regarding this approach.

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EVALUATION FOR PERMIT TO CONSTRUCT/OPERATE**APPLICANT'S NAME:** LA CITY, DWP VALLEY GENERATING STATION**MAILING ADDRESS:** P.O. BOX 51111, RM 1050
LOS ANGELES, CA 90051 - 0100**EQUIPMENT ADDRESS:** 11801 SHELDON ST, SUN VALLEY, CA 91352 - 1420**EQUIPMENT DESCRIPTION:**

Fuel Storage and Dispensing Facility Consisting of:

- 1) 1 - GASOLINE UNDERGROUND STORAGE TANK, 12,000 GALLON CAPACITY, EQUIPPED WITH PHASE I VAPOR RECOVERY SYSTEM PHIL-TITE (VR-101-E/K), NOT METHANOL COMPATIBLE.
- 2) 1 - DUAL COMPARTMENT UNDERGROUND GASOLINE STORAGE TANK, 12,000 GALLON CAPACITY, EQUIPPED WITH PHASE I VAPOR RECOVERY SYSTEM PHIL-TITE (VR-101-E/K), NOT METHANOL COMPATIBLE, CONSISTING OF:

A) ☐ ONE 6,000 GALLON GASOLINE COMPARTMENT.

B) ☐ ONE 6,000 GALLON GASOLINE COMPARTMENT.
- 3) 6 - GASOLINE BELLOWS-LESS NOZZLES DISPENSING 6 PRODUCTS, EQUIPPED WITH PHASE II VAPOR RECOVERY SYSTEM, HEALY PHASE II EVR SYSTEM NOT INCLUDING ISD (VR-201-A).

BACKGROUND HISTORY:

This application was submitted for an alteration on 10/24/2008. The planned installation date will be as soon as the permit is granted. The alteration involves the removal of the 6 existing gasoline dispensing balance nozzles and replacing them with 6 gasoline dispensing Healy Phase II EVR nozzles not including ISD. The facility's proposed normal operating schedule is as follows: 24 hours/day, 7 days/week, 30 days/month and 52 weeks/year. This is a non-retail gasoline storage and dispensing facility. No record of Notice to Comply was found in the Inspector Report files. The facility has received 8 Notices of Violation from the District. The applicant has since remedied these notices. An application, A/N 431577 was previously filed with the District for this equipment. *The applicant called and said that they will remove bulk loading at this site. Thus R463 is no longer required.*

PROCESS DESCRIPTION:

The gasoline storage and dispensing facility is used to store and dispense one grade of gasoline. This facility is equipped with CARB certified Phase I and Phase II vapor controls, which complies with R461. Furthermore, these vapor controls are considered to be T-BACT, which complies with R1401. Finally, the alteration will not result in a net emission increase and thus will comply with Reg. XIII.

EMISSION CALCULATIONS:

The hydrocarbon and benzene emissions from storage tank filling and motor vehicle refueling operations are estimated by using appropriate emission factors summarized in the following table. These emission factors were developed by the District's Planning Division.

I. Emission Factors and Control Efficiencies

The following table summarizes the uncontrolled ROG emission factors in pounds per 1,000 gallons of gasoline throughput, benzene content of gasoline, and control efficiencies:

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Emission Factors and Control Efficiencies for Underground Tanks

Process Type	Uncon. ROG (Lbs/1000 Gals) of GA	Benzene Content	Control Efficiency
Loading	8.40	0.3 wt%, Vapor	95%
Breathing	0.10	0.3 wt%, Vapor	75%
Refueling*	8.30	0.3 wt%, Vapor	96%
Spillage	0.42	1.0 wt%, Liquid	0%

*Assumes a more realistic 96% control efficiency for Phase II recovery system.

II. Calculations

The following equations are used for calculating ROG and Benzene emissions from gasoline (GA).
The emission factors have been modified from the CAPCOA ones to fit District specific assumptions:

Net Increased Throughput = Proposed throughput - Total permitted throughput prior to the modification or average throughput for the last two years

ROG, uncontrolled = EF (Lbs-ROG/1,000 Gals-GA) x Proposed GA Throughput (1,000 Gals/Month)
ROG, controlled = ROG, uncontrolled x Control Efficiency

Benzene, uncontrolled = ROG, uncontrolled x Benzene Content in GA
Benzene, controlled = ROG, controlled x Benzene Content in GA

Total Emission Increase - Underground Tanks

Proposed GA Throughput (Gals/Month)	40000
Average GA Throughput (Gals/Month)	40000
Net GA Throughput (Gals/Month)	0

The total emissions are as follows:

Process Type	ROG, R1 (Lbs/Month)	ROG, R2 (Lbs/Month)	Benzene, R1 (Lbs/Month)	Benzene, R2 (Lbs/Month)
Loading	336.00	16.80	1.01	0.05
Breathing	4.00	1.00	0.01	0.00
Refueling	332.00	13.28	1.00	0.04
Spillage	16.80	16.80	0.17	0.17
Total ROG	688.80	47.88	2.18	0.26

III. Summary of Emissions

	Total ROG		Total Benzene	
	R1	R2	R1	R2
Monthly (lb/mo)	688.80	47.88	2.18	0.26
30-day average (lb/day)	22.96	1.60	0.07	0.01
Hourly (lb/hr)	0.96	0.07	0.00	0.00

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CANCER RISK ASSESSMENT:

From gasoline storage and dispensing operations, benzene is the only toxic emittant that has significant effect to the maximum individual cancer risk (MICR). Using the CAPCOA provided risk values, the staff in the District's Planning Division prepared reference MICR's for different scenarios, i.e., for underground and aboveground tanks, and for residence and workers. These MICR's are tabulated for different downwind distances from a permit unit that is located in West LA with annual gasoline throughput of one million gallons.

Once a reference MICR is determined for a given downwind distance, it has to be adjusted by using the MET factor to reflect the meteorological conditions of a permit unit's location and the actual fuel throughput of a permit unit.

The following is the parameters used for calculating the MICR for this application. The distances are from the center of emission source to the nearest receptor areas:

Tank Type	= Underground
GA Throughput (MMGals-GA/Year)	= 0
Facility Zone	= 07
MET Factor	= 0.59
Downwind Distance to Residence (Meters)	= 30
Downwind Distance to Workers (Meters)	= 30

A reference MICR is determined for a given downwind distance in the following manner:

1. If the downwind distance is less than or equal to minimum pre-defined distance, use the MICR at the minimum distance.
2. If the downwind distance is greater than or equal to maximum pre-defined distance, use the MICR at the maximum distance.
3. Find MICRs two distances, i.e., one for nearest higher distance and the other one for nearest lower distance, and interpolate them.

$$\text{MICR, ref} = \text{MICR, low} + [(\text{MICR, high} - \text{MICR, low}) / (\text{High Dist} - \text{Low Dist})] \\ * (\text{Downwind Dist} - \text{Low Dist})$$

where,

MICR, ref	= Reference MICR at a given downwind distance
MICR, low	= MICR at a lower interpolate distance
MICR, high	= MICR at a higher interpolate distance
Low Dist	= Lower interpolate distance
High Dist	= Higher interpolate distance
Downwind Dist	= Given downwind distance

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MICR - Underground Tanks

MICR for Residences

Reference MICR [in-a-million / (1 MMGal-GA/Year)]
= 4.364

Adjusted MICR (in-a-million)

= (Reference MICR) x (MET factor) x (Annual Fuel Throughput)
= 4.364 x 0.59 x 0 = 0

MICR for Workers

Reference MICR [in-a-million / (1 MMGal-GA/Year)]
= 0.861

Adjusted MICR (in-a-million)

= (Reference MICR) x (MET factor) x (Annual Fuel Throughput)
= 0.861 x 0.59 x 0 = 0**Calculation for Non-Cancer Health Effects:**

The chronic and acute non-cancer health effects for benzene, xylene and toluene are not being calculated. This is based on the CAPCOA Gasoline Service Station Industrywide Risk Assessment Guidelines, Appendix I, finding that the benzene cancer risk of 10 in a million will be exceeded far sooner than the Hazard Index for benzene, xylene or toluene.

Modeling Assumptions:

The modeling assumes the generic station operates 24 hours/day, with 80% of the emissions occurring between 6:00 AM and 8:00 PM, and the remaining 20% of the emissions occurring between 8:00 PM and 6:00 AM. In addition, the refueling and spillage emissions were modeled as volume sources and the loading and breathing emissions as point sources (Sample ISCST3 model input files for the generic retail station are documented in AQMD Industrywide Guidelines).

Risk Calculations:

The revised risk calculation for 1,000,000 gallons a year throughput for the different distances (20, 25, 30....1000 meters) are based on the benzene inhalation cancer potency factor of 0.1/(mg/kg-day).

RULES EVALUATION:**Rule 212**

The maximum individual cancer risk is less than ten-in-one million. There is no school located within 1,000-feet from this facility. Public notice is exempt.

Rule 461

All gasoline and methanol (if any) tanks are equipped with CARB Phase I vapor controls. All tanks are also equipped with submerged fill tubes. All nozzles serving the gasoline and methanol, if any, tanks are equipped with Phase II vapor controls. Therefore, this facility complies with Rule 461.

Rule 1170

None of underground fuel storage tanks at this facility is methanol compatible. These tanks were installed prior to July 1, 1988. This facility complies with the provisions of this rule.

Rule 1401

The facility's MICR to the most sensitive area is 0 in-a-million. The facility complies with this rule.

Rule REGXIII

The alteration will not result in a net emission increase. BACT and Offsets are not required. No modeling required for VOCs. Complies with Rule.

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Reference MICR Chart - Underground Tanks

(a) MICR for Residential Areas - Underground Tanks per One Million Gallons of Gasoline

Dist(m)	20	25	30	40	50	60	70	75	80	90
MICR	7.283	5.542	4.364	2.897	2.054	1.528	1.181	1.05	0.939	0.765

Dist(m)	100	125	150	175	200	250	300	350	400	450
MICR	0.636	0.427	0.307	0.232	0.181	0.12	0.086	0.065	0.051	0.041

Dist(m)	500	600	700	800	900	1000
MICR	0.034	0.024	0.018	0.014	0.012	0.01

(b) MICR for Commercial Areas - Underground Tanks per One Million Gallons of Gasoline

Dist(m)	20	25	30	40	50	60	70	75	80	90
MICR	1.437	1.094	0.861	0.572	0.405	0.302	0.233	0.207	0.185	0.151

Dist(m)	100	125	150	175	200	250	300	350	400	450
MICR	0.125	0.084	0.061	0.046	0.036	0.024	0.017	0.013	0.01	0.008

Dist(m)	500	600	700	800	900	1000
MICR	0.007	0.005	0.004	0.003	0.002	0.002

MET Factors for Facility Zones

Zone	1	2	3	4	5	6	7	8	9	10	11	12
MET	0.45	1.00	0.69	0.97	0.51	0.56	0.59	0.64	0.65	1.18	0.65	0.71

Zone	13	15	16	17	18	19	20	21	22	23	24	25
MET	0.70	0.70	0.58	0.57	0.60	0.45	0.60	0.45	0.78	0.78	0.78	0.78

Zone	26	27	28	29	30	31	32	33	34	35	36	37	38
MET	0.78	0.78	0.78	0.53	0.73	0.73	0.54	0.54	0.78	1.19	0.54	0.78	1.19